POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES

Docket No. R2001-1

Motion Of Major Mailers Association To Accept Late Filed Interrogatory

Major Mailers Association ("MMA") requests that the Interrogatory MMA/USPS-T-22-76 be accepted for filing out of time. MMA, a supporter of the pending Settlement, is filing this single interrogatory in lieu of cross examining USPS witness Miller, ¹ and possibly other USPS witnesses, in order to expedite completion of the adjusted hearing procedures prescribed in POR 30, issued January 8, 2002. The interrogatory is addressed to a complex, narrow issue that is best handled through supplemental discovery. MMA is authorized to state that the USPS does not oppose a grant of this motion.

Respectfully submitted,

Major Mailers Association

By:

Michael W. Hall

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540-554-8880 Counsel for

Major Mailers Association

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document in compliance with the Commission's Rules of Practice.

Dated this 9th day of January, 2002.

Michael W. Half

¹ MMA reserves the right to cross examine USPS witness Miller as necessary to clarify cross examination propounded by any opponent of the Settlement.